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**IN THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF UTAH**

ROBERT RYAN JOHNSON, as Executor  
and Representative of the Estate of  
Terrence Blair Hunter,  
Plaintiff,  
v.

STANDARD REGISTRAR & TRANSFER  
COMPANY, INC., a Utah Corporation;  
  
Defendants.

**DECLARATION BY ROBERT RYAN  
JOHNSON**

Case No. 2.22-cv-591-DAO

Magistrate Judge Oberg

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Plaintiff, ROBERT RYAN JOHNSON, ("Mr. Johnson") as Executor and Trustee  
of the Estate of Terrence Blair Hunter, hereby declares:

**MY BACKGROUND**

1. I am the executor of the Estate of Terrence Hunter and bring this matter as  
executor and representative of the Estate.
2. I am a Canadian citizen, having been born and raised in British Columbia,  
Canada.

### **Terrence Hunter's Estate**

3. I met Terrance Blair Hunter, or Terry, through a mutual friend in 2013.
4. Terry and I went into business together. He became my mentor and we became close friends. We bonded over a similar outlook on life. Among other things, we were both estranged from our families. Terry had no wife and no kids so as our friendship grew Terry took me in as an 'adopted' son.
5. Although Terry was, like me, a Canadian native, he had lived in Mexico for the last (approximately) 20 years of his life. That's where his house was. That's where he spent most of his time.
6. I became aware that Terry's health had taken a turn for the worse in 2017. He emailed me a full power of attorney in August 2017 which I executed on his behalf. Terry didn't feel comfortable telling me at first what was wrong but ultimately told me that he had cancer.
7. In August 2019 Terry flew to Vancouver and went straight from the airport to the hospital by ambulance.
8. By that point Terry's health was not going to get better. He decided to take advantage of Canada's death with dignity laws, also sometimes referred to as physician-assisted suicide.
9. Among Terry's final decisions was to settle his affairs including his estate. He made me the executor and beneficiary of his estate, signing his will before two witnesses, one of which was a notary. That will is attached as Exhibit 7.

10. Two days later, on his own accord, Terry passed away under the care and supervision of physicians.
11. After his death I began the process of probating Terry's will. Because of my unfamiliarity with probate law I first contacted a law firm in Canada who informed me that because Terry was a resident in Mexico that the will would need to be probated there. That letter is attached as Exhibit 8.
12. On the recommendation of a friend I retained Basham Law, a large Mexican law firm, to handle the probate because I am unfamiliar with the process, let alone Mexican laws governing probate.
13. Basham Law instructed me to have the will processed by Notaria Publica #10, Francisco Oscar Lechon Ruiz, a notary employed by the Country of Mexico.
14. Ruiz, an official for the Mexican government, completed the probate process of recognizing me as the executor of Terry's estate, creating the document that is attached to the Complaint and also attached here as Exhibit 5.
15. In the course of processing Terry's estate it became clear to me that some of Terry's stocks were transferred without proof that he authorized their sale.
16. This immediately called to mind the issue I personally faced nearly 10 years prior with Action Stock Transfer.
17. I tried to obtain documents from the Defendant through numerous emails without success. This raised my suspicion that the Defendant engaged in a similar kind of negligence with Terry's stocks as I experienced with my own. Ultimately it became clear that my only recourse would be legal action.

**State Court Lawsuit – Case 210903485**

18. I retained Brody Valerga to file a lawsuit against the Defendant in civil case 201903485. That lawsuit was assigned to Judge Lawrence.
19. While the Defendant's motion to dismiss was denied, the judge asked for further documentation showing my authority to act on behalf of Terry's estate.
20. The judge also ordered that I pay a \$5,000 bond.
21. Because the Utah court would not take payment from Canada I sent the \$5,000 to my attorney to have him then pay the court.
22. I don't know why he didn't do it, but my attorney didn't make the payment by the time it was due.
23. Instead of refiling that lawsuit right away I moved on with new counsel taking other steps to make sure that there would be no mistake about my authority to act as the executor of Terry's will. I proceeded to file for probate in Canada.

**Next Legal Steps**

24. The first action I took was to have the will probated in British Columbia where I live. Exhibit 4.
25. I also had the will probated in Utah. See Exhibit 3. See also Exhibit 6 showing the letter testamentary that was issued after the probate was complete.
26. As the executor of the estate, I have a responsibility to make sure that all of the estate's financial information is accounted for. On the recommendation of my attorney, I served a third-party subpoena to the defendant in the probate action. I did this because it is part of my responsibilities as the executor and also

because the Defendant has fought with everything they have to not send me documents in their possession about the transfer of Terry's stocks.

27. The Defendant objected to that subpoena. And on the advice of counsel I decided to not litigate that in probate court. Having my authority to act on behalf of the estate of Terry recognized in Utah, I instead decided that it was time to file a successor lawsuit. I retained Deiss Law for this suit.

### **2012 Lawsuit**

1. I was the principal of Qube Capital Ltd a B.C. Corporation, which brought a Utah suit against Action Stock Transfer in 2012, Case No. 12098465.
2. My claim was for approximately \$350,000 based on my best guess on damages and without knowing how damages were supposed to be calculated (at beginning of that case there was a co-plaintiff who also had a claim for approximately \$350,000).
3. I brought that suit after learning that some of my securities were no longer in my possession but were taken by an individual named Randy Hamdan.
4. I brought that case against Action Stock Transfer for negligently transferring stocks to Hamdan. During the course of that suit I, through my attorney, made discovery requests including a request for the stock powers in the company's possession that would have vindicated my claim. Action Stock Transfer never disclosed the stock powers to me and instead offered me a favorable settlement amount.

5. I decided that on the balance of competing interests that I was comfortable with the offer and took it. I never saw the stock power and doubt that it ever existed, but I chose to let the issue go.
6. Randy Hamdan has since been convicted of securities fraud in connection with other issues.
7. In his sworn declaration, J. Michael Coombs states that Canadians and Mexicans often take advantage of the American securities market. I don't know what he's referring to and it couldn't have anything to do with the issues in this case, but in any event Hamdan, to the best of my knowledge, is an American. At the time of that lawsuit he was living or operating in the Detroit area.

#### **Other Background**

8. J. Michael Coombs accuses me of bringing suits against transfer agents for a living. I don't know where he got that idea. The only lawsuit I have ever brought against a transfer agent was the 2012 case discussed above. I am bringing this lawsuit on behalf of Terrence Hunter's estate based on the illegal transfers of Terry's stocks.
9. I stand by my background as being an upright person. In fact, I've previously supplied evidence to the SEC and the FBI which led to the criminal prosecution against several individuals involved in securities fraud. That case is 1:20-cr-00842. This came about after individuals indicted in that case sued me for a meritless claim that was dismissed. After that case was dismissed I learned

other information about them that I then supplied to the SEC and FBI as evidence that they had committed securities fraud.

10. Finally, I don't know if it matters, but I do also want to point out that I am autistic. Securities law, patterns, and numbers make a lot of sense to me. However, most of the time, people don't make sense to me. I am shocked at how much time, money, and energy I have had to spend to have the Defendant turn over documents in their possession that they are mandated by law to turn over in three business days or less (17 CFR § 240.17) that would show their role in the transfer of Terry's stocks that appear to have been done fraudulently. This has been a complicated process because it has involved the legal systems of three different countries. In spite of the challenging process, the steps I have taken to pursue this matter have at all times been with the intent of complying with the law.

I declare under penalty of perjury under the law of Utah and federal law that the foregoing is true and correct.

DATED this November 9, 2022

Robert Ryan Johnson

Robert Johnson  
Robert Johnson (Nov 9, 2022 17:19 PST)


# Ex 1 Johnson Decl. Rule 11 2.0

Final Audit Report


2022-11-10


Created:	2022-11-10
By:	David Ferguson (dferguson@deisslaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAGr5fKepyChby5PxO5WXIjHNNrHCTOLe


## "Ex 1 Johnson Decl. Rule 11 2.0" History


 Document created by David Ferguson (dferguson@deisslaw.com)  
2022-11-10 - 1:02:57 AM GMT

 Document emailed to rrj.rob@me.com for signature  
2022-11-10 - 1:03:26 AM GMT

 Email viewed by rrj.rob@me.com  
2022-11-10 - 1:13:55 AM GMT

 Signer rrj.rob@me.com entered name at signing as Robert Johnson  
2022-11-10 - 1:19:56 AM GMT

 Document e-signed by Robert Johnson (rrj.rob@me.com)  
Signature Date: 2022-11-10 - 1:19:58 AM GMT - Time Source: server

 Agreement completed.  
2022-11-10 - 1:19:58 AM GMT